

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CIVIL ACTION NO 7:22 CV 00061 M

FILED

MAY 12 2022

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY gmc DEP CLK

KELLI MUSE

Plaintiff,

v.

RUSSELL ERIC WHITFIELD

Defendant,

ANSWER TO COMPLAINT

I, the Defendant, answer the complaint of the Plaintiff as follows:

1. Eric Whitfield has never harassed the Plaintiff.
2. Eric Whitfield is aware of the Civil Rights Act of 1964.
3. Eric Whitfield did not inflict emotional distress upon the Plaintiff. Eric Whitfield was never in a supervisory role over the Plaintiff. Eric Whitfield is aware of retention issues throughout the entire Onslow County work force.
4. Eric Whitfield will not pay monetary relief for Plaintiff's reaction to viewpoints in which the Plaintiff disagrees.
5. It is Eric Whitfield's belief that the Plaintiff resides in Craven County.
6. Eric Whitfield believes Onslow County Board of Education is located in Jacksonville, North Carolina.
7. It is Eric Whitfield's understanding that the Plaintiff was employed with Onslow County Schools from the time he took office (December 2020) through April 14, 2022.
8. Eric Whitfield is a citizen and resident of Onslow County, North Carolina.
9. It is Eric Whitfield's belief that the Plaintiff likely resides in the Eastern District of North Carolina.
10. Eric Whitfield does not have information regarding this claim.
11. Eric Whitfield does not have information regarding this claim.
12. Eric Whitfield has not exercised any employment practices either lawful or unlawful.
13. Eric Whitfield does not have information regarding this claim.
14. Eric Whitfield believes the Plaintiff was employed at Onslow County Schools from the time he took office through April 14, 2022
15. The Plaintiff reached out to Eric Whitfield in or around October 2021.

16. It is Eric Whitfield's observation was that the Plaintiff was unhappy with the work flow in the Onslow County School District because it wasn't compatible with her experiences in the Craven County School District.
17. Eric Whitfield has no information regarding this claim.
18. Eric Whitfield did meet with the Plaintiff on October 22, 2021.
19. Eric Whitfield did not have a Facebook page at the time he was contacted by the Plaintiff. The Plaintiff told Eric Whitfield that he should check the Plaintiff out on Facebook to see what the Plaintiff was all about.
20. Eric Whitfield did call Plaintiff on December 3, 2021 after the Plaintiff asked him to call the Plaintiff. Eric Whitfield seen no need to call the Plaintiff at all. This was the Plaintiff's request. Eric Whitfield had no desire whatsoever to call the Plaintiff on December 3, 2021 and never had any intentions to following up. The Plaintiff led me to believe that the Plaintiff was calling because "There was a lot not said last night." When Eric Whitfield called the Plaintiff, he was met with a challenge about the Plaintiff not getting her bonus pay which she soon realized was not true. Then the Plaintiff continued to make derogatory comments about Jeff Holliman, Barry Collins, and Beth Folger. Eric Whitfield never used the terminology that the Plaintiff did not count. Eric Whitfield said, "I don't know why you care. You don't even live here".
21. Eric Whitfield did text Melissa Oakley to tell her that he thought he had made the Plaintiff mad.
22. Eric Whitfield and the Plaintiff had an ongoing back and forth conversation between December 3, 2021 through December 6, 2021 that was initiated by the Plaintiff.
23. Eric Whitfield never posted a video calling the Plaintiff retarded or a stupid bitch. Eric Whitfield made a theatrical parody of events that were entirely exaggerated and untrue. Eric Whitfield does not recall the exact date of the video but the theatrical parody was never intended to be factual.
24. Eric Whitfield has testified in criminal court under oath that he didn't not intentionally send the message, "Where are you located?". As of April 7, 2022 Plaintiff is fully aware that Eric Whitfield did not intentionally send that message.
25. On December 15, 2021 Eric Whitfield sent an email to the Plaintiff inquiring if the Plaintiff filed a false claim with the Onslow County Health Department. No accusations were made. Eric Whitfield was careful not to accuse because Eric Whitfield was informed the complaint was anonymous. Eric Whitfield later sent the same inquiry to Kylene Rose. Kylene Rose is a more likely suspect than the Plaintiff. It is Eric Whitfield's belief that the Plaintiff did not make this false complaint to the Onslow County Health Department.
26. This could be a true statement.
27. Eric Whitfield has never bullied, harassed, sex-based discriminated, or cyberstalked anybody. The State of North Carolina has convicted Eric Whitfield of cyberstalking the Plaintiff. All speech between the Plaintiff and Eric Whitfield is protected political speech under the First Amendment of the United States Constitution. The court has made their decision so Eric Whitfield's belief is irrelevant on this matter. It is very likely that both Eric Whitfield and the Plaintiff suffer from mental illnesses that may deem them both incompetent to stand trial. Eric Whitfield has been diagnosed with major depressive disorder without psychotic features and general anxiety disorder.
28. This could be a true statement.
29. This could be a true statement.
30. On or about December 6, 2022 the Plaintiff attempted to file charges against Eric Whitfield for conveying threats, harassment, and cyberstalking. The magistrate denied charging Eric Whitfield with conveying threats. The magistrate denied charging Eric Whitfield with harassment. Eric Whitfield was charged with cyberstalking.
31. Kristen Greer is not a victim. This is a libelous statement.
32. Eric Whitfield has no information about this claim.
33. Eric Whitfield has no information about this claim.

34. Eric Whitfield was charged with one count of cyberstalking. Eric Whitfield has never been charged with any other crime since his birth through May 11, 2022.
35. Eric Whitfield attended a hearing related to a no contact order on December 13, 2021. Eric Whitfield attended a hearing related to a no contact order on January 31, 2022. Eric Whitfield attended a hearing for a no contact order on March 17, 2022. The no contact order was denied all three times. The Plaintiff did not show up for any of these hearings. On April 7, 2022 both Eric Whitfield and the Plaintiff were present for the hearing regarding the no contact order. The no contact order was granted due to Eric Whitfield's consent. No arguments were made by the Plaintiff or Eric Whitfield on whether the no contact order be granted or not.
36. Eric Whitfield mailed a letter to the Plaintiff because he was required to do so by the court. Eric Whitfield did not even know the Plaintiff's address until he was served with notice regarding the no-contact hearing.
37. This video was never intended to be factual. This video was a parody of real events with outrageous and foolish exaggerations. In this video Eric Whitfield never mentions the Plaintiff and never implies that the events were real.
38. This could be a true statement.
39. Eric Whitfield has no information about this claim.
40. I never mentioned the Ku Klux Klan. KKK are the initials of three people that have incessantly attacked me. The Plaintiff, Kelli Knapp, and Kristen Greer. I cleverly called this hate group the KKK for entertainment purposes.
41. Eric Whitfield never intended for this video to be factual. This video was also a parody of real events with outrageous and foolish exaggerations. In this video Eric Whitfield never mentions the Plaintiff and never implies that the events were real.
42. Eric Whitfield posted a video explaining his long term political strategy to reduce the property tax revenues in Onslow County back to 2017 levels. Eric Whitfield never had a desire to win the 2020 Onslow County Board of Education race. This is true. Being an elected official can have some negative consequences that regular people do not have to encounter. Nice people do not cut property taxes. This would have to be done by someone very mean. I have spent a lot of time branding myself as the meanest politician in Onslow County. Being hated by a small minority is beneficial for the purpose of name recognition.
43. Eric Whitfield does not understand this reference.
44. Eric Whitfield has no information regarding this claim.
45. Eric Whitfield has no information regarding this claim.
46. I did post a picture of Kelli's Kitchen on my Facebook page but I do not know what day. It is a restaurant located in Rainsville, Alabama.
47. This is possibly true. I have no recollection of the specifics.
48. This is correct. All the names of the three people attacking me start with the letter K, thus the abbreviation KKK.
49. I do not recall the specifics of this video but it sounds reasonable.
50. Greg Muse was at the January 4, 2022 meeting. I don't recall what he said exactly.
51. This statement is false. The Board of Education voted to direct the Board Attorney Alex Erwin to write a letter of censure.
52. This video was of Greg Muse addressing the Board with music playing in the background.
53. That video was a recap of the December 7, 2021 meeting. I was referencing Kristen Greer because she spoke at that meeting. It is true. I did not have sexual relations with Kristen Greer.
54. Eric Whitfield has no information about this statement.

55. The cyberstalking that I encountered in March 2020 has passed the statute of limitations. I am not eligible to file charges against the Plaintiff for cyberstalking me until my no contact order is lifted on April 9, 2023.
56. Eric Whitfield is pretty sure this statement is true.
57. Eric Whitfield has no information about this statement.
58. Bill Lanier and Eric Whitfield were not present when Alex Erwin addressed the Onslow County Board of Education regarding his findings.
59. Eric Whitfield was not in that meeting and does not know what was discussed.
60. Eric Whitfield has yet to be issued a copy of that no contact order. Eric Whitfield had to go to the court house and retrieve it himself. Eric Whitfield did not even know the document existed until he was told about it by Trevor Dunnell from the New Bern Sun Journal.
61. Eric Whitfield has no information regarding this matter.
62. Eric Whitfield did receive an email regarding this matter. The statement appears to be true.
63. Eric Whitfield does not know the exact date but at one time that was on the thirddtable.org website.
64. This is true.
65. Eric Whitfield does not know about this situation.
66. Eric Whitfield does not know about this situation.
67. Eric Whitfield believes this statement to be false. If the Plaintiff was having emotional trauma she would not be filing an emotional laborious lawsuit to torture herself more and more. That does not add up. The matter was resolved on December 7, 2021. The Plaintiff has ensured that the situation is continued for as long as possible by filing criminal charges and civil charges. There is no emotional trauma whatsoever. There is no evidence of it. Anybody can hire a counselor.
68. This is true.
69. This is true. The statement Eric Whitfield made was true. The Plaintiff bullies lots of people. Eric Whitfield does not tolerate bullies. Eric Whitfield finds bullies disgusting and repulsive.
70. The Plaintiff did not show up for the no contact order hearing on March 17, 2022. That was the third hearing for the same no contact order that the Plaintiff did not show up for. Eric Whitfield is unsure why the judge didn't throw it out the second time around.
71. Eric Whitfield cannot verify the specifics but it sounds like a true statement.
72. This is a true statement.
73. This is a true statement.
74. This statement is irrelevant to the matter at hand.
75. Eric Whitfield does not know the specific wording of the motion but it included the hiring of outside counsel in regards to issuing a censure.
76. Eric Whitfield admitted to wrong doing and agreed that he deserved to be censured for showing pictures of Kristen Greer's children on his Facebook page. The Plaintiff was never mentioned.
77. Eric Whitfield knows that this happened but does not know the specific dates.
78. Eric Whitfield does not recall Alex Erwin making comments about the Board's decision but it is entirely possible.
79. Melissa Oakley and Eric Whitfield were excluded from the litigation committee.
80. Eric Whitfield was placed in jail within 2 hours of finally getting a lawyer. The District Attorney had months to prepare. Eric Whitfield's lawyer had minutes to prepare.
81. Eric Whitfield does not know if the Plaintiff was contacted by a friend or not.
82. Eric Whitfield has not contacted the Plaintiff since December 15, 2021. The Plaintiff stalked all of my online activity and recruited others to stalk all of my online activity. There is no harassment.

83. This is a true statement.
84. Eric Whitfield does not have any information regarding this comment.
85. This is a true statement.
86. This is true although I'm not certain on the dates.
87. Eric Whitfield is not sure about this statement but it sounds true.
88. Eric Whitfield only knows about this through hearsay.
89. Eric Whitfield does not have any information regarding this statement.
90. Eric Whitfield does not have any information regarding this statement.
91. This is true.
92. This is true.
93. Eric Whitfield does not know all the details but the Plaintiff did challenge the ruling.
94. Eric Whitfield does not know how to respond to this.
95. Eric Whitfield does not know how to respond to this.
96. Plaintiff supplied proof that Eric Whitfield and Plaintiff were engaged in a mutual back and forth conversation. There was no harassment.
97. Eric Whitfield has no information about this.
98. Eric Whitfield has no information about this.
99. Eric Whitfield has no information about this.
100. Eric Whitfield has no information about this.
101. Eric Whitfield doesn't understand this comment.
102. Eric Whitfield has not been censured as of the date of this document.
103. Eric Whitfield has no comments about this statement.
104. The Plaintiff was not discriminated against.
105. There was no sexual advances. There was no advances of a sexual nature either verbal or physical. This is absurdity.
106. The Plaintiff created a hostile work environment.
107. This is highly doubtful.
108. Eric Whitfield has no comments about this statement.
109. This is true.
110. There was no harassment.
111. The Board of Education is not Eric Whitfield's supervisor. There was no harassment or bullying.
112. This is highly unlikely.
113. This is highly unlikely.
114. Eric Whitfield has no comments about this statement.
115. This is possible. Eric Whitfield should have refused to meet with the Plaintiff. The warning signs were there. Eric Whitfield thought he was being helpful by allowing the Plaintiff to vent.
116. There was no behavior. This situation was resolved and over on December 6, 2021. The Plaintiff chose to escalate the situation which lead to the emotional distress suffered by both the Plaintiff and Eric Whitfield
117. This is possible but the Plaintiff's overreactions has caused this thing to last for months when it was over in 3 days.
118. This is highly doubtful.
119. Eric Whitfield has no comments about this.
120. Eric Whitfield does not understand this statement.

- 121. Eric Whitfield never made a statement regarding sexual relations with the Plaintiff. The Plaintiff is aware of this.
- 122. Eric Whitfield does not have any information about this statement.
- 123. Eric Whitfield is not aware of this third party.
- 124. This is highly doubtful.
- 125. Eric Whitfield has no comments about this statement.
- 126. Eric Whitfield is unaware of anyone brave enough to ridicule the Plaintiff.
- 127. Eric Whitfield made no false statements concerning the Plaintiff.
- 128. This could possibly be true. Eric Whitfield does not recall any specifics.
- 129. This is highly unlikely.

This is the 12 day of May, 2022.



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